



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 30 2007

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jim Maderski, Operations Manager
Hydrite Chemical Company
114 N Main Street
Cottage Grove, Wisconsin 53527

Re: Notice and Finding of Violation
Hydrite Chemical Co.
Cottage Grove, Wisconsin

Dear Mr. Maderski:

The U.S. Environmental Protection Agency is issuing the enclosed Notice and Finding of Violation (FOV) to Hydrite Chemical Co. (you) under Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3). We find that you are violating the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Off-Site Waste and Recovery Operations, at 40 C.F.R. Part 63, Subpart DD; the NESHAP for Miscellaneous Organic Chemical Production and Processes at 40 C.F.R. Part 63, Subpart FFFF; the NESHAP for Organic Liquids Distribution (Non-Gasoline) at 40 C.F.R. Part 63, Subpart EEEE; and your federally enforceable Construction and Operation permits at the facility located in Cottage Grove, Wisconsin.

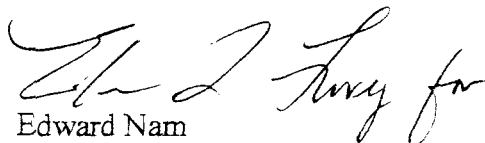
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Victoria Nelson. You may contact her at (312) 886-9481 or nelson.victoria@epa.gov to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed Nam", followed by the word "for" in a smaller, less distinct script.

Edward Nam
Director
Air and Radiation Division

Enclosure

cc: Dave Welsh, Environmental, Health & Safety Manager
Hydrite Chemical Co.
dave.welsh@hydrite.com

Ken Yass, Technical Regulatory Services Manager
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1. Section 112 of the Act, 42 U.S.C. § 7412, requires the EPA to promulgate a list of all categories and subcategories of new and existing “major sources” and “area sources” of hazardous air pollutants (HAP) and establish emissions standards for the categories and subcategories. These emission standards are known as the National Emission Standards for Hazardous Air Pollutants (NESHAP). The EPA codified these standards at 40 C.F.R. Parts 61 and 63.
2. “Major source” is defined as “any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.” 42 U.S.C. § 7412(a)(1).
3. “Area source” is defined as “any stationary source of hazardous air pollutants that is not a major source.” 42 U.S.C. § 7412(a)(2).
4. “Stationary source” is defined as “any building, structure, facility, or installation, which emits or may emit any air pollutant.” 42 U.S.C. § 7411(a)(3).
5. “Hazardous air pollutant” is defined as “any air pollutant listed in or pursuant to” Section 112(b) of the Act. 42 U.S.C. § 7412(a)(6).

6. Section 112(i)(3) of the Act, 42 U.S.C. § 7412(i)(3), prohibits any person subject to a NESHAP from operating a source in violation of a NESHAP after its effective date. See also 40 C.F.R. §§ 61.05 and 63.4.
7. The NESHAP, at 40 C.F.R. Part 63, Subpart A, contain general provisions applicable to the owner or operator of any stationary source that contains an affected facility subject to the NESHAP at Part 63. These include definitions at 40 C.F.R. § 63.2.
8. The NESHAP, at 40 C.F.R. § 63.2, defines “existing source” as any affected source that is not a new source.
9. The NESHAP, at 40 C.F.R. § 63.2, defines “new source” any affected source the construction or reconstruction of which is commenced after EPA first proposes a relevant emission standard under 40 C.F.R. Part 63 establishing an emission standard applicable to such source.
10. The NESHAP, at 40 C.F.R. § 63.2, defines “fugitive emissions” as those emissions from a stationary source that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening. Under Section 112 of the Act, all fugitive emissions are to be considered in determining whether a stationary source is a major source

The NESHAP for Off-Site Waste and Recovery Operations at 40 C.F.R. Part 63, Subpart DD

11. Pursuant to Section 112 of the Act, the EPA promulgated the NESHAP for Off-Site Waste and Recovery Operations (NESHAP Subpart DD) at 40 C.F.R. Part 63, Subpart DD, 40 C.F.R. §§ 63.680 - 63.698, on July 1, 1996. 61 *Fed. Reg.* 34158.
12. The NESHAP Subpart DD applies to the owner and operator of a plant site that is a major source of HAP emissions, and a waste management operation that receives "off-site material" and is regulated as a hazardous waste treatment, storage, and disposal facility (TSDF) under either 40 C.F.R. part 264 or 265. 40 C.F.R. § 63.680(a) and (b)(1).
13. Except under limited circumstances that do not apply here, an “off-site material” under the NESHAP Subpart DD is: (1) a waste, used oil, or used solvent, as those terms are defined in 40 C.F.R. § 63.681; (2) that is not produced or generated within the plant site and is delivered, transferred, or otherwise moved to the plant site from an outside location; and (3) contains one or more of the HAP listed in Table 1 of the NESHAP Subpart DD. 40 C.F.R. § 63.680(b)(1).
14. An "affected source" under the NESHAP Subpart DD is the entire group of off-site material management units associated with the operation. An off-site material management unit is a tank, container, oil-water separator, organic-water separator, or transfer system used to manage off-site material. 40 C.F.R. § 63.680(c).
15. The owner or operator must control air emissions from the off-site material management unit in accordance with the applicable standards specified in 40 C.F.R. §§ 63.685 - 63.689. 40 C.F.R. § 63.683(b).

16. At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. 40 C.F.R. § 63.683(e).
17. A deviation includes any instance in which an affected source, or an owner or operator of an affected source, fails to meet any requirement or obligation established by the NESHAP Subpart DD. 40 C.F.R. § 63.683(f).
18. The owner or operator shall submit a summary report specified in 40 C.F.R. § 63.10(e)(3) on a semiannual basis (i.e., once every 6-month period). The summary report must include a description of all deviations as defined in 40 C.F.R. §§ 63.683(f) and 63.695(e) that have occurred during the 6-month reporting period. 40 C.F.R. § 63.695(b)(4).
19. For an affected tank at an existing source that is not used for a waste stabilization process, the owner or operator shall determine whether the tank is required to use either Tank Level 1 controls or Tank Level 2 controls as specified by Table 3 of the NESHAP Subpart DD based on the off-site material maximum HAP vapor pressure and the tank's design capacity. 40 C.F.R. § 63.685(b)(1)(i).
20. The owner or operator shall control air emissions from a tank using Tank Level 1 controls in accordance with the provisions specified in the NESHAP for Tanks – Level 1 (NESHAP Subpart OO) at 40 C.F.R. Part 63, Subpart OO, 40 C.F.R. §§ 63.900 – 63.908. 40 C.F.R. § 63.685(c)(2)(i).
21. A “closure device” is defined as a cap, hatch, lid, plug, seal, valve, or other type of fitting that prevents or reduces air pollutant emissions to the atmosphere by blocking an opening in a cover when the device is secured in the closed position. 40 C.F.R. § 63.681.
22. A “closed-vent system” is defined as a system that is not open to the atmosphere and is composed of hard-piping, ductwork, connections, and, if necessary, fans, blowers, or other flow-inducing devices that conveys gas or vapor from an emission point to a control device. 40 C.F.R. § 63.681.
23. “Bypass” means diverting a process vent or closed vent system stream to the atmosphere such that it does not first pass through an emission control device. 40 C.F.R. § 63.681.
24. The owner or operator who controls tank air emissions by venting through a closed-vent system to a control device shall meet the requirements specified in 40 C.F.R. § 63.685(g)(1) through (3). 40 C.F.R. § 63.685(g).
25. 40 C.F.R. § 63.685(g)(1)(ii) provides that each opening in the fixed roof not vented to the control device shall be equipped with a closure device. If the pressure in the vapor headspace underneath the fixed roof is equal to or greater than atmospheric pressure when the control device is operating, the closure device shall be designed to operate with no detectable organic emissions.

26. 40 C.F.R. § 63.685(g)(1)(iv) states that the closed-vent system and control device shall be designed and operated in accordance with the requirements of 40 C.F.R. § 63.693.
27. The owner or operator using a closed-vent system to control air emissions in accordance with the NESHAP Subpart DD must meet the requirements of 40 C.F.R. § 63.693(c). 40 C.F.R. § 63.693(a).
28. 40 C.F.R. § 63.693(c)(1) provides that the vent stream required to be controlled shall be conveyed to the control device by either (i) a closed-vent system that is designed to operate with no detectable organic emissions using the procedure specified in 40 C.F.R. § 63.694(k); or (ii) a closed-vent system that is designed to operate at a pressure below atmospheric pressure.
29. 40 C.F.R. § 63.693(c)(2) provides that in situations when the closed-vent system includes bypass devices that could be used to divert a vent stream from the closed-vent system to the atmosphere at a point upstream of the control device inlet, each bypass device must be equipped with either a flow indicator or a seal or locking device as specified in 40 C.F.R. § 63.693(c)(2)(ii).
30. 40 C.F.R. § 63.693(c)(2)(ii) provides that if a seal or locking device is used to comply with 40 C.F.R. § 63.693(c)(2) of this section, the device shall be placed on the mechanism by which the bypass device position is controlled (e.g., valve handle, damper lever) when the bypass device is in the closed position such that the bypass device cannot be opened without breaking the seal or removing the lock.
31. The owner or operator must inspect and monitor the closed-vent system for compliance in accordance with the procedures specified in 40 C.F.R. § 63.695(c). 40 C.F.R. § 63.695(a)(2).
32. 40 C.F.R. § 63.695(c)(1)(ii)(A) provides that closed-vent system joints, seams, or other connections that are permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange) shall be visually inspected at least once per year to check for defects that could result in air emissions. The owner or operator shall monitor a component or connection using the procedures specified in 40 C.F.R. § 63.694(k) of this subpart to demonstrate that it operates with no detectable organic emissions following any time the component is repaired or replaced (e.g., a section of damaged hard piping is replaced with new hard piping) or the connection is unsealed (e.g., a flange is unbolted).
33. 40 C.F.R. § 63.695(c)(1)(ii)(B) provides that closed-vent system components or connections other than those specified in Paragraph 32 shall be monitored at least once per year using the procedures specified in 40 C.F.R. § 63.694(k) to demonstrate that components or connections operate with no detectable organic emissions.
34. 40 C.F.R. § 63.695(c)(1)(ii)(D) provides that the owner or operator shall visually inspect the seal or closure mechanism required by 40 C.F.R. § 63.693(c)(2)(ii) at least once every month to verify that the bypass mechanism is maintained in the closed position.

35. The owner or operator shall maintain a record of the closed-vent system inspection and monitoring in accordance with the requirements specified in 40 C.F.R. § 63.696. 40 C.F.R. § 63.695(c)(1)(iv).
36. 40 C.F.R. § 63.688(b)(1)(i) provides that an owner or operator must control air emissions from an affected container having a design capacity greater than 0.1 m^3 and less than or equal to 0.46 m^3 in accordance with the standards for Container Level 1 controls as specified in the National Emission Standards for Containers (NESHAP Subpart PP) at 40 C.F.R. §§ 63.920 – 63.929.
37. 40 C.F.R. § 63.688(b)(1)(ii) provides that, as an alternative to 40 C.F.R. § 63.688(b)(1)(i), an owner or operator may choose to control air emissions from an affected container having a design capacity greater than 0.1 m^3 and less than or equal to 0.46 m^3 in accordance with the standards for Container Level 2 controls as specified in the NESHAP Subpart PP.
38. 40 C.F.R. § 63.683(d) provides that the owner or operator must control equipment leaks from each equipment component that is part of the affected source by implementing leak detection and control measures in accordance with the standards specified in 40 C.F.R. § 63.691.
39. The NESHAP Subpart DD requires owners or operators to control air emissions from equipment leaks by utilizing one of the following options: (i) controlling HAP emitted from equipment leaks in accordance with 40 C.F.R. § 61.242-61.247; or (ii) controlling HAP emitted from equipment leaks in accordance with 40 C.F.R. §§ 63.162-63.182. 40 C.F.R. § 63.691(b).
40. The owner or operator must achieve the following performance specifications at the vapor incinerator control device: destroy the total organic compounds (TOC), less methane and ethane, contained in the vent stream entering the vapor incinerator by 95 percent or more, on a weight-basis. 40 C.F.R. § 63.693(f)(1).
41. The owner or operator must demonstrate that the vapor incinerator achieves the performance requirements of 40 C.F.R. § 63.693(f)(1) by conducting performance testing in accordance with the requirements of 40 C.F.R. § 63.694(l). 40 C.F.R. § 63.693(f)(2).
42. 40 C.F.R. § 63.694(l) states that performance tests shall be based on representative performance (i.e. performance based on normal operating conditions). The owner or operator must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation.
43. 40 C.F.R. § 63.694(l)(1)(i) provides that to determine compliance with the control equipment percent reduction requirement, sampling sites shall be located at the inlet of the control device, and at the outlet of the control device. The control device inlet sampling site shall be located after the final product recovery device, and shall be selected to ensure that the measurement of total HAP concentration or TOC concentration includes all vent streams and primary and secondary fuels introduced into the boiler or process heater.

The NESHAP for Tanks – Level 1 at 40 C.F.R. Part 63, Subpart OO

44. Pursuant to Section 112(d) of the CAA, 42 U.S.C. § 7412(d), EPA promulgated the NESHAP for Tanks – Level 1 at 40 C.F.R. Part 63, Subpart OO, 40 C.F.R. §§ 63.900 – 63.908, on July 1, 1996. 61 *Fed. Reg.* 34184.
45. 40 C.F.R. § 63.902(b)(3) provides that each opening in the fixed roof, and any manifold system associated with the fixed roof shall be either: (i) equipped with a closure device designed to operate such that when the closure device is secured in the closed position there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the opening and the closure device; or (ii) connected by a closed-vent system that is vented to a control device, where the control device shall remove or destroy organics in the vent stream, and shall be operating whenever regulated material is managed in the tank.
46. 40 C.F.R. § 63.902(c) provides that whenever a regulated material is in the tank, the fixed roof shall have each closure device secured in the closed position except during specific events such as accessing the tank to conduct routine maintenance and repairs and removing accumulated sludge or other residues from the bottom of the tank.
47. 40 C.F.R. § 63.906(a)(1) provides that the fixed roof and its closure devices shall be visually inspected by the owner or operator to check for defects that could result in air emissions.
48. The owner or operator must perform an initial inspection following installation of the fixed roof. Thereafter, the owner or operator must perform the inspections at least once every calendar year. 40 C.F.R. § 63.906(a)(2).

The NESHAP for Containers at 40 C.F.R. Part 63, Subpart PP

49. Pursuant to Section 112(d) of the CAA, 42 U.S.C. § 7412(d), EPA promulgated the NESHAP for Containers at 40 C.F.R. Part 63, Subpart PP, 40 C.F.R. §§ 63.920 – 63.929, on July 1, 1996. 61 *Fed. Reg.* 34186.
50. 40 C.F.R. § 63.922(d) provides that whenever a regulated material is in a container using Container Level 1 controls, the owner or operator shall install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except during specific events such as filling the container, removing material, or performing routine activities.
51. 40 C.F.R. § 63.923(d) provides that whenever a regulated material is in a container using Container Level 2 controls, the owner or operator shall install all covers and closure devices for the container, and secure and maintain each closure device in the closed position except during specific events such as filling the container, removing material, or performing routine activities.

The NESHAP for Equipment Leaks at 40 C.F.R. Part 61, Subpart V

52. Pursuant to Section 112 of the CAA, 42 U.S.C. § 7412, EPA promulgated the NESHAP for Equipment Leaks at 40 C.F.R. Part 61, Subpart V, 40 C.F.R. §§ 61.240 – 61.247, on June 6, 1984. 49 *Fed. Reg.* 23513.
53. As of June 6, 1984, the NESHAP Subpart V applies to each of the following sources that are intended to operate in volatile hazardous air pollutant (VHAP) service: pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and control devices or systems required by Subpart V. *See* 40 C.F.R. § 61.240(a).
54. 40 C.F.R. § 61.241 defines “volatile hazardous air pollutant or VHAP” to mean a substance regulated by 40 C.F.R. Part 61 for which a standard for equipment leaks of the substance has been promulgated.
55. 40 C.F.R. § 61.241 defines “in VHAP service” to mean that a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 10 percent by weight a volatile hazardous air pollutant.
56. 40 C.F.R. § 61.242-1(d) requires that each piece of affected equipment be marked in such a manner that it can be distinguished readily from other pieces of equipment.
57. 40 C.F.R. § 61.241 defines “in vacuum service” to mean that equipment is operating at an internal pressure which is at least 5 kilopascals (kPa) (0.7 psia) below ambient pressure.
58. 40 C.F.R. § 61.246(e)(5) provides that a list of identification numbers for equipment in vacuum service shall be recorded in a log that is kept in a readily accessible location.
59. 40 C.F.R. § 61.242-2(a)(1) requires that each pump be monitored monthly to detect leaks by the methods specified in 40 C.F.R. § 61.245(b).
60. 40 C.F.R. § 61.242-2(a)(2) states that each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.
61. 40 C.F.R. § 61.242-2(b)(1) and (2) defines a detected leak at a pump as an instrument reading of 10,000 ppm or greater, and/or indications of liquids dripping from the pump seal.
62. 40 C.F.R. § 61.242-6(a)(1) and (2) provide that each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve which shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.
63. 40 C.F.R. § 61.242-8(a) provides that if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pressure relief devices in liquid service, the owner or operator shall monitor the equipment within 5 days, or shall eliminate the visual, audible, olfactory, or other indication of a potential leak.

64. 40 C.F.R. § 242-8(b) provides that a leak is detected at a pressure relief device in liquid service if an instrument reading of 10,000 ppm or greater is measured.

The NESHAP for Miscellaneous Organic Chemical Production and Processes at 40 C.F.R. Part 63, Subpart FFFF

65. On November 10, 2003, EPA promulgated the NESHAP for Miscellaneous Organic Chemical Manufacturing (MON), codified at 40 C.F.R. Part 63, Subpart FFFF. 68 *Fed. Reg.* 63888. The NESHAP for MON establishes emission standards, requirements to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with miscellaneous organic chemical manufacturing. *See* 40 C.F.R. § 63.2430.
66. 40 C.F.R. § 63.2445(b) provides that owners and operators of existing sources subject to the MON must comply with the requirements for existing sources no later than May 10, 2008.
67. 40 C.F.R. § 63.2435(a) provides that owners and operators are subject to the MON if they operate miscellaneous organic chemical manufacturing process units (MCPU) that are located at, or are part of, a major source of HAP emissions as defined in Section 112(a) of the CAA.
68. 40 C.F.R. § 63.2550 defines “miscellaneous organic chemical manufacturing process” as all equipment which collectively functions to produce a product or isolated intermediate that is “material” described in 40 C.F.R. § 63.2435(b). Process includes any, all or a combination of reaction, recovery, separation, purification, or other activity, operation, manufacture, or treatment which are used to produce a product or isolated intermediate.
69. 40 C.F.R. § 63.2435(b) provides that a MCPU includes equipment necessary to operate a miscellaneous organic chemical manufacturing process that, among other things, processes, uses or generates any of the organic HAPs listed in Section 112(b) of the Act. A MCPU also includes any assigned storage tanks and transfer racks; equipment in open systems that is used to convey or store water having the same concentration and flow characteristics as wastewater; and equipment such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, open ended valves or lines, valves, connectors, and instrumentation systems that are used to manufacture any material or family, including but not limited to an organic chemical with an SIC code listed in 40 C.F.R. § 63.2435(b)(1)(i).
70. 40 C.F.R. § 63.2550 defines “in organic HAP service” to mean a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic as determined according to Method 18 of 40 C.F.R. Part 60, Appendix A. *See also* 40 C.F.R. § 63.180(d)(1).
71. 40 C.F.R. § 63.2480 and Table 6 list the requirements for leaks for equipment that is in organic HAP service, and includes the standards set forth in the NESHAP for Organic Hazardous Air Pollutants for Equipment Leaks (HON) at 40 C.F.R. Part 63 Subpart H.

72. The HON, at 40 C.F.R. § 63.169(b), provides that a leak is detected if an instrument reading of 10,000 parts per million (ppm) or greater for agitators, 5,000 ppm or greater for pumps handling polymerizing monomers, 2,000 ppm or greater for all other pumps (including pumps in food/medical service), or 500 ppm or greater for valves, connectors, instrumentation systems, and pressure relief devices is measured.

The NESHAP for Organic Liquid Distribution at 40 C.F.R. Part 63, Subpart EEEE

73. On February 3, 2004, EPA promulgated the NESHAP for Organic Liquids Distribution (Non-Gasoline) (NESHAP Subpart EEEE), codified at 40 C.F.R. Part 63, Subpart EEEE. 69 *Fed. Reg.* 5063. The NESHAP Subpart EEEE establishes emission standards, requirements to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with non-gasoline organic liquid distribution. See 40 C.F.R. § 63.2330.
74. 40 C.F.R. § 63.2342(b)(1) provides that owners and operators of existing sources subject to the NESHAP Subpart EEEE must comply with the requirements for existing sources no later than February 5, 2007.
75. 40 C.F.R. § 63.2334(a) provides that owners and operators are subject to the NESHAP Subpart EEEE if they operate an organic liquids distribution operation that is located at, or are part of, a major source of HAP emissions as defined in Section 112(a) of the CAA.
76. 40 C.F.R. § 63.2406 defines "organic liquids distribution operation" as the combination of activities and equipment used to store or transfer organic liquids into, out of, or within a plant site regardless of the specific activity being performed. Activities include, but are not limited to, storage, transfer, blending, compounding, and packaging.
77. 40 C.F.R. § 63.2338(b) provides that an affected source is composed of all storage tanks storing organic liquids; all transfer racks at which organic liquids are loaded into or unloaded out of transport vehicles and/or containers; and all equipment leak components in organic liquids service that are associated with storage tanks storing organic liquids, transfer racks loading or unloading organic liquids, pipelines that transfer organic liquids directly between two storage tanks that are subject to this subpart, pipelines that transfer organic liquids directly between a storage tank subject to this subpart and a transfer rack subject to this subpart, pipelines that transfer organic liquids directly between two transfer racks subject to this subpart, all transport vehicles while they are loading or unloading organic liquids at transfer racks subject to this subpart, and all containers while they are loading or unloading organic liquids at transfer racks subject to this subpart.
78. 40 C.F.R. § 63.2346(c) provides that for each pump, valve, and sampling connection, the owner or operator must comply with the applicable requirements and standards for equipment leaks under 40 C.F.R. Part 63, Subpart TT, Subpart UU, or Subpart H.

The NESHAP for Pharmaceuticals Production at 40 C.F.R. Part 63, Subpart GGG

79. On September 21, 1998, EPA promulgated the NESHAP for Pharmaceuticals Production (NESHAP Subpart GGG), codified at 40 C.F.R. Part 63, Subpart GGG. 63 *Fed. Reg.* 50326. The NESHAP Subpart GGG establishes, among other standards, requirements for performance testing of “large control devices.” See 40 C.F.R. § 63.1250.
80. A “large control device” is defined as a control device that controls total HAP emissions of greater than or equal to 10 tons/yr. before control. 40 C.F.R. § 63.1251.
81. 40 C.F.R. § 63.1257(d)(3)(ii)(A) states that the performance shall be conducted by performing emission testing on the inlet and outlet of the control device following the testing methods and procedures of 40 C.F.R. § 63.1257(b).
82. 40 C.F.R. § 63.1257(d)(3)(ii)(B) provides that performance testing shall be conducted under absolute or hypothetical worst-case conditions, as defined in paragraphs 40 C.F.R. 63.1257(b)(8)(i)(A) through (B).
83. The owner or operator may elect to conduct more than one performance test on the control device for the purpose of establishing more than one operating condition at which the control device achieves the required control efficiency. 40 C.F.R. § 63.1257(d)(3)(ii)(C).

Wisconsin State Implementation Plan

84. On January 18, 1995, EPA approved the Wisconsin Federally Enforceable Operating Permit (FESOP) program. See 60 *Fed. Reg.* 3543. The Wisconsin regulations governing the FESOP program are codified at Wisconsin Administrative Code rule (NR) 407 and 40 C.F.R. § 52.2570(c).
85. On January 18, 1995, EPA approved the Wisconsin Construction Permit program. See 60 *Fed. Reg.* 3543. The Wisconsin regulations governing the Construction Permit program are codified at NR 406 and 40 C.F.R. § 52.2570(c).

Hydrite’s Operation and Construction Permits

86. The Wisconsin Department of Natural Resources issued an Operation Permit, No. 113063390-P12 (2011 Operation Permit), to the Facility on September 9, 2011.
87. The 2011 Operation Permit contains a set of special conditions (Condition I.A.) that apply to the entire Facility.
88. Condition I.A.3.a.(2)(c) states that the permittee shall only use specific emission units to process off-site waste materials, which includes the T200 series tanks and T400(a) and T400(b) of the T400 series tanks.
89. Condition I.A.5.b.(3) states that the Facility shall prepare, maintain, and update a written plan to calculate the VOC and HAP emission rate for each emission unit. This plan shall be updated at a minimum every five years.

90. Condition I.A.7.a.(1)(e) states that Hydrite shall limit the VOC emissions from all materials processed to not more than 41,000 pounds per month averaged over each consecutive 12-month period for the entire Facility.
91. Condition I.A.7.b.(2)(d) provides that compliance with the VOC emission limits shall be calculated in accordance with the provisions of the 2011 Operation Permit for processes, control devices, fugitive losses, tank farms, and other sources of VOC as appropriate. Emissions from all sources shall be summed to determine compliance with the facility-wide emission limitations.
92. Condition I.A.7.b.(2)(b) provides that the permittee shall calculate VOC emissions from fugitive losses according to the EPA's 1995 Protocol for Equipment Leak Emission Estimates.
93. Condition I.A.7.b.(2)(c) provides that emissions for any tank containing HAP shall be calculated according to EPA methodology to control VOC emissions.
94. Condition I.A.8.a.(1)(a) provides that federal HAP emissions from the Facility may not exceed 1,666 pounds per month (10 tons per year) of any individual HAP.
95. Condition I.A.8.a.(1)(b) provides that federal HAP emissions from the Facility may not exceed 4,166 pounds per month (25 tons per year) of all HAP combined. This limit and the limit given in Paragraph 94 shall be determined as an average over each consecutive 12-month period.
96. Condition I.A.8.b.(2)(d) provides that compliance with the HAP emission limits shall be calculated in accordance with the provisions of the 2011 Operation Permit for processes, control devices, fugitive losses, tank farms, and other sources of HAP as appropriate. Emissions from all sources shall be summed to determine compliance with the facility-wide emission limitation
97. Condition I.A.8.c.(1) provides that the Facility shall sum the results of all of the monthly facility-wide individual HAP totals to determine the monthly combined HAP emissions.
98. Condition I.A.8.b.(1)(b) provides that the permittee shall calculate HAP emissions from fugitive losses according to the EPA's 1995 Protocol for Equipment Leak Emission Estimates.
99. Condition I.A.8.b.(1)(c) provides that emissions for any tank containing HAP shall be calculated according to EPA methodology to control Federal Hazardous Air Pollutant emissions.
100. The 2011 Operation Permit includes additional applicable requirements while processing off-site material (Condition I.G.) that apply to all affected process equipment and control devices.

101. Condition I.G.2.a.(1) provides that the permittee shall control total organic compound (TOC) emissions by 98 percent control efficiency on all process vents when processing off-site materials containing HAP listed in Table 1 of the NESHAP Subpart DD.
102. Condition I.G.2.b.(1) provides that the permittee shall demonstrate compliance with Paragraph 101 and control HAP emissions by connecting each process vent through a closed-vent system to a control device that is designed and operated in accordance with 40 C.F.R. § 63.693.
103. The 2011 Operation Permit includes additional requirements (Condition I.M.) for the Tank Farms located at the East Facility of Hydrite's operations, including the T200 and T400 series tanks for off-site materials.
104. The permittee shall provide Tank Level 1 controls in accordance with the NESHAP Subpart OO for tanks that contain HAP listed in Table 1 of the NESHAP Subpart DD. Compliance with this requirement shall occur upon startup for sources constructed or modified after October 13, 1994. Compliance with this requirement shall occur on or before February 1, 2000 for sources constructed before October 13, 1994. Condition I.M.2.a.(1).
105. The affected storage tanks shall have a fixed roof with the specifications given in 40 C.F.R. § 63.902(c). Condition I.M.2.b.(2).
106. The affected storage tanks shall have the fixed roof installed whenever a regulated material is in the tank. Condition I.M.2.b.(3).
107. The permittee shall inspect the fixed roof and its closure devices. Condition I.M.2.b.(4).
108. The permittee shall prepare and maintain a record for each tank with information including the date that each inspection of the fixed roof and its closure devices is performed. Condition I.M.2.c.(4)(c).
109. The 2011 Operation Permit contains conditions (Condition I.C.) applicable to operation of the carbon adsorber (carbon drum), C05.
110. The permittee shall monitor emissions from the relief vents on each carbon adsorber (carbon drum) used to control VOC and VHAP emissions at a minimum of every 30 days with a photoionization detector for total VOC. If an instrument reading of organic compounds exceeds 500 ppm, breakthrough is considered detected. Condition I.C.1.a.(2).
111. Upon detection of breakthrough, the permittee shall replace the activated carbon in the control device. Condition I.C.1.a.(3).
112. The 2011 Operation Permit includes additional conditions (Condition I.ZZZ.) applicable to the entire Facility.
113. The permittee must include all deviations from and violations of applicable requirements in semi-annual monitoring reports. Condition I.ZZZ.1.b.(1)(d).

114. The Wisconsin Department of Natural Resources issued a Construction Permit, No. 14-SML-060 (2015 Construction Permit), to the Facility on February 26, 2015.
115. The 2015 Construction Permit includes a set of conditions (2015 Condition I.B.) that applies to the thermal oxidation system used as a control device.
116. 2015 Condition I.B.2.a.(1) requires that the thermal oxidation system have a control efficiency of VOC and organic HAP that shall be maintained at a minimum of 98 percent.
117. 2015 Condition I.B.2.b.(2) provides that the permittee shall perform compliance emission tests to verify the overall control efficiency of the thermal oxidizer. Compliance testing shall be done in accordance with the procedures in 40 C.F.R. § 63.1257(d)(3)(ii)(A) through (C).
118. 2015 Condition I.B.2.b.(2) also provides that control efficiency shall be conducted within 90 days of issuance of the 2015 Construction Permit and at least once every 24 months.

Findings of Fact

119. Hydrite owns and operates the Facility located at 114 N Main Street, Cottage Grove, Wisconsin 53527. Hydrite took ownership of the Facility in 1970.
120. The Facility is a chemical manufacturing plant that also operates as a hazardous waste transfer, storage, and disposal facility (TSDF). The chemicals that Hydrite processes at the Facility include, but are not limited to, methanol, formaldehyde, methyl methacrylate, glycol ether, and off-site hazardous waste material.
121. Hydrite's Operation and Construction Permits include terms and conditions designed to limit HAP and VOC emissions below Title V and major source thresholds. These terms and conditions are federally enforceable pursuant to Section NR 407.09(3)(a) of the Wisconsin State Implementation Plan.
122. On April 3 through 6, 2017, EPA conducted a CAA inspection at the Facility.
123. Hydrite operates equipment at the Facility that includes but is not limited to pumps, valves, and pressure relief devices that are intended to operate in off-site material and VHAP service, and are therefore subject to the NESHAP for Equipment Leaks at 40 C.F.R. Part 61, Subpart V.
124. During EPA's inspection, Hydrite provided EPA with the Facility's leak, detection, and repair database for equipment monitored at the Facility since October 2012 (LDAR database). The LDAR database included monitoring data for compliance with the requirements of 40 C.F.R. Part 61, Subpart V.
125. During the inspection, EPA requested logs of equipment in vacuum service. Hydrite confirmed that it does not document if pieces of equipment are in vacuum service during monitoring.

126. The LDAR database identified 823 pieces of equipment subject to 40 C.F.R. Part 61, Subpart V, under the requirements of the NESHAP Subpart DD.
127. During the inspection on April 4, 2017, EPA detected a leak at a pump in off-site material service, identified as SOD-TP-900, by both visual inspection and EPA Method 21 instrument readings of 30,000 and 50,000 ppm. The pump was last monitored on March 27, 2017, and a leak was not detected. Weekly visual monitoring failed to identify the visual leak.
128. Additionally, the LDAR database shows that Hydrite did not monitor the SOD-TP-900 pump monthly in 2012 and 2013, totaling 24 months of missed monitoring.
129. During the inspection, EPA noted three untagged pieces of equipment in off-site material service at Column 1 in the North Process Room of the Facility, including one bleeder valve and two instrumentation valves.
130. During the inspection, Hydrite provided two statements of certification stating that the affected equipment at the Facility, including the tanks listed in Paragraph 131, is equipped with and operating air emission controls according to the requirements of 40 C.F.R. Part 63, Subpart DD.
131. Hydrite confirmed that the following tanks in off-site material service have Level 1 controls in accordance with the requirements of Table 3 of the NESHAP Subpart DD and its 2011 Operation Permit: T204, T205, T212, T213, T214, T215, T218, T219, T220, T221, T241, T242, T401, T402, and T405.
132. Hydrite controls emissions from the tanks identified in Paragraph 131 by venting to a thermal oxidizer with a closed-vent system. The closed-vent system is not designed to operate at a pressure below atmospheric pressure.
133. During the inspection, EPA conducted monitoring of equipment at the tanks in off-site material service identified in Paragraph 131. The results of this monitoring are summarized in Table 1.
134. Each tank identified in Paragraph 131 has a fixed roof equipped with a manway and manway cover. The manway cover, which serves as the closure or locking device for the manway, is designed to be secured with one bolt. EPA observed unbolted manways on T241 and T242 at the Facility. EPA noted that T212 was bolted during monitoring. EPA measured detectable emissions to the atmosphere at both unbolted and bolted manways, as shown in Table 1.
135. Each tank identified in Paragraph 131 has a fixed roof equipped with a pressure relief device which Hydrite identifies as a "pressure safety element" (PSE).
136. Each tank identified in Paragraph 131 has a fixed roof equipped with a conservation vent and vacuum breaker also used as a pressure relief device.
137. Each tank identified in Paragraph 131 has a fixed roof equipped with an agitator.

138. During the inspection, EPA noted that Hydrite does not inspect or monitor the closed-vent system at the affected tanks. The LDAR database does not contain records of inspections of any of the affected tank roofs' equipment, including manways, PSEs, and agitators. Hydrite confirmed that it does not inspect or monitor these pieces of equipment on the affected tanks' roofs.

139. Below is a table with the results of EPA monitoring of equipment on the roofs of tanks in off-site material service conducted on April 4, 2017. EPA measurements were made with a flame ionization detector for VOC and organic HAP emissions.

Tank	Equipment Type	Tag (if applicable)	Instrument Reading (ppm)	Confirmation Reading (ppm)
T204	Manway		> 10,000	Hydrite staff observed reading
T205	Vacuum Breaker		1,800	674
T205	PSE	T205-PSE-100	5,200	
T205	Agitator		> 10,000	> 10,000
T212	Manway		> 10,000	> 10,000
T213	Manway		1,700	
T213	Agitator		1,200	
T220	PSE	T220-PSE-100	> 10,000	> 10,000
T221	Manway		> 10,000	> 10,000
T241	Manway		> 10,000	> 10,000
T241	PSE		680	520
T241	Agitator		> 10,000	> 10,000
T242	PSE	T242-PSE-100	> 10,000	> 10,000
T242	Manway		> 10,000	> 10,000

T405	PSE	T405-PSE-100	3,800	Hydrite staff observed reading
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140. During the inspection, EPA reviewed isometric drawings of monitored equipment annotated with monitoring results created by a third-party consulting service. EPA noted instances in which third-party monitoring found unsealed open-ended lines. EPA also reviewed Hydrite's Semi-Annual Compliance Monitoring Reports submitted in 2014, 2015, and 2016 to comply with the reporting requirements of the NESHAP Subpart DD. Hydrite did not report the unsealed open-ended lines EPA noted as deviations in its Semi-Annual Compliance Monitoring Reports.
141. In the South Dock ("SOD," as identified by Hydrite) of the East Side of the Facility, drums of off-site hazardous material are unloaded and charged to process vessels.
142. On April 4, 2017, between 2:45 PM and 4:22 PM CST, EPA observed an open hazardous waste drum with a capacity 55 gallons. The drum was labeled with a profile identification number (96050052) per U.S. Department of Transportation regulations. EPA took an instrument reading for VOC emissions at the opening of the drum of 2,500 ppm. This reading confirms the presence of VOC and organic HAP emissions. Hydrite staff confirmed the observation.
143. At the time of the observation, the SOD was empty and inactive. Only EPA engineers and Hydrite staff on the EPA inspection tour were present. The hazardous waste drum was not actively being unloaded or filled.
144. During the inspection, EPA requested all spreadsheets used to calculate VOC and HAP emissions from the Facility's operations. Hydrite provided emissions calculations for 2015 and 2016.
145. Calculations for HAP and VOC emissions from fugitive losses are absent from the 2015 and 2016 emissions calculations described in Paragraph 144.
146. During the inspection, Hydrite confirmed that it does not calculate or account for fugitive losses from the Facility's operations.
147. Based on a review of the 516 process model used to calculate HAP emissions during the inspection, EPA found that the model was underestimating methyl methacrylate (MMA) emission rates and was last updated in 2006.
148. Hydrite operates three scrubbers not included in its permits. The "Northwest," "Northeast," and "South" scrubbers are used to control air emissions from processes at the Facility, and are located upstream of the thermal oxidizer.
149. The South Process Room has a dedicated scrubber (South scrubber) used to control air emissions. Hydrite confirmed that, due to the nature of the continuous 516 process, the

South scrubber is used as the main control device if the thermal oxidizer is down when the continuous 516 process is running.

150. During the inspection, EPA requested past performance testing reports for the thermal oxidizer. Hydrite provided a report from testing of the thermal oxidizer dated June 25, 2015, and entitled "Report on the Destruction Efficiency Testing" (2015 Report).
151. The 2015 Report does not state whether or not the Northwest, Northeast, and South scrubbers were running during the performance test; however, Hydrite confirmed that the scrubbers were running during the performance testing described in the 2015 Report.
152. Hydrite uses 55 gallon drums containing activated carbon (carbon drums) to control HAP emissions from HAP-containing tanks including T162 and T173.
153. During the inspection, EPA received an inventory of all tanks at the Facility, which includes the tank's design capacity, which control device is used to control emissions, and what material is held in the tank.
154. On April 5, 2017, EPA used a flame ionization detector (FID) to monitor for breakthrough of the vent stream exiting carbon drum for tank T173. EPA measured an instrument reading of 4,800 ppm.
155. On April 5, 2017, Hydrite took a meter reading using a photoionization detector (PID). Hydrite's PID has a 10.6 eV lamp. Hydrite measured 0 ppm at the carbon drum vent stream at T173.
156. Hydrite uses T173 to store methanol. Methanol has an ionization potential of 10.84 eV.
157. Hydrite uses T162 to store formalin, a 37 percent formaldehyde solution. Formaldehyde has an ionization potential of 10.88 eV.
158. Since Hydrite's PID has a 10.6 eV lamp, it cannot read emissions from chemicals with an ionization potential greater than 10.6 eV. Hydrite is unable to detect breakthrough from the carbon drums controlling tanks T162 and T173 using a PID.
159. During the inspection, EPA requested Hydrite's Carbon Drum Monitoring records for 2015 and 2016. These records show that the carbon drum controlling tank T173 has not been changed in at least two years. Hydrite confirmed that it had not changed the carbon drum in at least two years.
160. During the inspection, EPA toured the West Side of the Facility where chemical products are accepted, shipped, and packaged for distribution. EPA noted two specific instances of open and inactive containers venting to the open air.
161. In the Solvent Filling Room at the West Side, EPA observed a drum labeled as glycol ether with a wand sitting in the opening. The drum was not being filled or unloading, and no member of Hydrite staff was using the drum for any purpose at the time of the observation. EPA measured an instrument reading of 4,300 ppm at the drum opening.

162. Also in the Solvent Filling Room, EPA observed two open drums contained hazardous waste. One drum had a filling wand in the opening and was not actively being unloaded or filled. EPA measured an instrument reading of 6,800 ppm.
163. At the West Side operations of the Facility, Hydrite stores, transfers, blends, compounds, or packages organic liquids, including, but not limited to, methanol and methyl isobutyl ketone.
164. Hydrite did not account for fugitive emissions from the following operations at the Facility in its required monthly and 12-month rolling emission calculations for VOC and individual and total HAP: storage of off-site material, HAP, and VOC in tanks; tank unloading and loading; West Side drumming and truck unloading and loading; and equipment leaks from pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, or instrumentation systems.
165. From 2008 to the present, Hydrite's total emissions for HAP, including fugitive emissions from HAP emission sources at the Facility, have exceeded 10 tpy (individual) and/or 25 tpy (total).

Violations

166. Hydrite has failed to comply with the provisions of 40 C.F.R. Part 63, Subpart DD, in violation of 40 C.F.R. § 63.680(a) and Section 112 of the Act, 42 U.S.C. § 7412.
167. Hydrite has failed to operate and maintain affected sources at its Facility in a manner consistent with safety and good air pollution control practices for minimizing emissions in violation of 40 C.F.R. § 63.683(e).
168. Hydrite has failed to control air emissions from each tank at its Facility used to manage off-site material, including but not limited to the tanks specified in Paragraph 131, in accordance with the requirements listed in 40 C.F.R. § 63.685, in violation of 40 C.F.R. § 63.683(b)(1)(i) and § 63.685(b).
169. Hydrite has failed to control air emissions from each container used to manage off-site material, in accordance with requirements listed in 40 C.F.R. § 63.688, in violation of 40 C.F.R. § 63.683(b)(1)(i) and § 63.688, which require compliance with the standards for control specified in 40 C.F.R. Part 63, Subpart PP at 40 C.F.R. § 63.922(d) and § 63.923(d).
170. Hydrite has failed to control air emissions from leaks for all pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, or instrumentation systems that contain off-site material having a total HAP concentration equal to or greater than 10 percent by weight and are intended to operate for 300 hours or more during a calendar year in accordance with either 40 C.F.R. § 61.242 through 61.247 in 40 C.F.R. Part 61, Subpart V National Emission Standards for Equipment Leaks or 40 C.F.R. § 63.162 through 63.182 in Subpart H National Emission Standards for Organic Hazardous Air Pollutants from Equipment Leaks, in violation of 40 C.F.R. § 63.691.

171. Hydrite has failed to control air emissions from each closed-vent system that is designed to operate with no detectable organic emissions or is designed to operate at a pressure below atmospheric pressure, in violation of 40 C.F.R. § 63.693(c).
172. Hydrite has failed to perform the inspection and monitoring procedures listed in 40 C.F.R. § 63.695(a)(1) and (2), in violation of 40 C.F.R. § 63.695(a).
173. Hydrite has failed to submit reports to the Administrator in accordance with the applicable notification and reporting requirements in 40 C.F.R. § 63.9 and 63.10 as specified in Table 2 of 40 C.F.R. 63, Subpart DD, in violation of 40 C.F.R. § 63.697(a).
174. From May 2008 to the present, Hydrite has been a major source of HAP and therefore required to comply with the requirements of the NESHAP for MON at 40 C.F.R. Part 63, Subpart FFFF. Hydrite has failed to comply with the requirements of the NESHAP for MON, which include emission standards, requirements to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with miscellaneous organic chemical manufacturing, in violation of 40 C.F.R. Part 63, Subpart FFFF and Section 112 of the Act, 42 U.S.C. § 7412.
175. From February 2007 to the present, Hydrite has been a major source of HAP and therefore required to comply with the requirements of the NESHAP for Organic Liquids Distribution at 40 C.F.R. Part 63, Subpart EEEE. Hydrite has failed to comply with the requirements of the NESHAP Subpart EEEE, which include emission standards, requirements to demonstrate initial and continuous compliance with emission limits, operating limits, work practice standards, and recordkeeping requirements associated with non-gasoline organic liquids distribution, in violation of 40 C.F.R. Part 63, Subpart EEEE and Section 112 of the Act, 42 U.S.C. § 7412.
176. Hydrite has failed to update within 5 years a written plan to calculate the VOC and HAP emission rate for each emission unit in violation of its 2011 Operation Permit Condition I.A.5.b.(3).
177. Hydrite has failed to calculate VOC emissions from fugitive losses in violation of its 2011 Operation Permit Condition I.A.7.b.(2)(d).
178. Has failed to calculate HAP emissions from fugitive losses in violation of its 2011 Operation Permit Condition I.A.8.b.(2)(d).
179. Hydrite has failed to monitor its carbon adsorber control devices with a photoionization detector for total VOC in violation of its 2011 Permit Condition I.C.1.a.(2).
180. Hydrite has failed to conduct a performance test in accordance with the requirements of 40 C.F.R. § 63.1257(d)(3)(ii)(A) through (C) in violation of its 2015 Construction Permit Condition I.B.2.b.(2).

Environmental Impacts

181. VOC emissions increase the amount of pollutants that have the ability to create photochemical smog under certain conditions.
182. HAP emissions increase the amount of pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, and/or adverse environmental effects.

Date

6/30/17

Edward Nam

Director

Air and Radiation Division

CERTIFICATE OF MAILING

I certify that I sent a Notice and Finding of Violation, No. EPA-5-17-WI-03, by Certified Mail, Return Receipt Requested, to:

Jim Maderski, Operations Manager
Hydrite Chemical Co.
114 N Main Street
Cottage Grove, Wisconsin 53527

I also certify that I sent e-copies of the Finding of Violation by E-mail to:

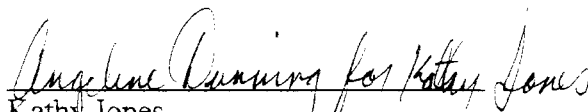
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On the 30th day of JUNE 2017


Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 1454 5064